

**EXHIBIT “A”**

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

TINA LINDQUIST,

Plaintiff,

-vs-

HEIM, L.P.,

Defendant.

Civil Action  
No. 04-249E

ORIGINAL

VIDEO DEPOSITION OF: John Hood, M.D.

DATE: February 23, 2007  
Friday, 2:00 p.m.

LOCATION: 300 State Street  
Erie, PA

TAKEN BY: Plaintiff  
Tina Lindquist

REPORTED BY: Cynthia A. Hawley  
Notary Public  
AKF Reference No. CH98501

1 with a sharp knife the zone of injury is very  
2 narrow. So I can save the vast majority of the  
3 structures. Versus an injury which is  
4 basically just a crushing nature like being hit  
5 with a sledge hammer and the width of the  
6 damage is the width of the sledge hammer.

7 So that amount of tissue in this  
8 instance was severely damaged so we had to take  
9 a lot out. Um, we, I almost always expect with  
10 these types of injuries one or two other  
11 operations that are related to either tissues  
12 dying, infection, the hardware not holding,  
13 vascular problems where the blood vessels clot  
14 off and we have to go back in and free up the  
15 blood vessels, take the little clot out and  
16 then sew them back together again.

17 Q. So after the first surgery, if I'm correct,  
18 Tina's thumbs would have been intact on each  
19 hand; is that correct?

20 A. That's correct. There are no injuries to her  
21 thumbs.

22 Q. And her ring and long finger would have been  
23 intact on each hand?

24 A. Yes.

25 Q. Doctor, I'm going to show you a series of five

1           photographs and ask if you can identify those  
2           for us?

3       A.     Yeah. These are Tina's hands probably close to  
4           a month out after the surgery I would say from  
5           my recollection.

6       Q.     Is that how her hands would have appeared after  
7           the surgery, after that 10 to 12-hour procedure  
8           that you just described?

9       A.     The black areas would not have been there.  
10          Okay. The hands would have been much more  
11          swollen than what they are here.

12      Q.     Okay.

13      A.     And they would have been rather bloody.

14      Q.     Okay. Is that how her hands appeared though  
15          through the course of her post-op?

16      A.     Yes.

17      Q.     Okay.

18      A.     Yes.

19      Q.     Can you turn that around so the jury can see  
20          those?

21      A.     (Witness complies).

22      Q.     Thank you.

23                   MR. CONLIN: Just for the record, I'm  
24           going to have the court reporter mark that as  
25           Hood Deposition Exhibit 1, and it's photographs

1 70, 79, 80, 75 and 77.

2 - - - -

3 (Exhibit No. 1 marked for identification.)

4 - - - -

5 BY MR. CONLIN:

6 Q. Doctor, after that initial surgery and post-op  
7 stay did Tina develop complications?

8 A. Some of the skin necrosed.

9 Q. What does that mean?

10 A. That means some of the skin died.

11 Q. Was an additional surgery necessary?

12 A. Yes.

13 Q. When did you do your next surgery on Tina?

14 A. Let's look here. Sometimes the electronic  
15 system is not as good as the paper system, so  
16 excuse me for being a little slow here. Let's  
17 see.

18 Q. Doctor, according to the records I've seen I  
19 believe the procedure was on October 5th of  
20 2002.

21 A. Yes.

22 Q. If that helps you find it on your computer.

23 A. With almost 400 pages of documents in here it  
24 gets a little lengthy. Let's see here. What  
25 was that date, 10/5 you said?

1 Q. And in the four and a half years that you've  
2 known her, from the time you met her in the  
3 operating room with the two surgical teams up  
4 until the last time you saw her --

5 A. Um-hum.

6 Q. -- has Tina been compliant with all the  
7 recommendations and suggestions that you've  
8 made to her?

9 A. Yes.

10 Q. Have you ever had her complain or refuse to do  
11 one of the therapies that you had asked her to  
12 do?

13 A. No. But she was really upset when I wouldn't  
14 let her have chocolate for a few months.

15 Q. Doctor, in addition to the photographs we used  
16 on the board I'm going to just show you what  
17 we're going to mark as Hood Deposition 4 and  
18 have you leaf through that.

19 - - - -  
20 (Exhibit No. 4 marked for identification.)

21 - - - -  
22 (There was a brief pause in the proceedings.)

23 - - - -

24

25 BY MR. CONLIN:

1 Q. Doctor, do those photographs fairly and  
2 accurately depict the chronology of the  
3 condition of Tina's hand from the time you  
4 first saw her in September of 2002 up until the  
5 time, up until the present?

6 A. Yes, it does.

7 MR. CONLIN: At this time I would ask  
8 the judge to permit the photo album which is  
9 marked as Dr. Hood's Deposition Exhibit 4 to be  
10 passed among the jury.

11 BY MR. CONLIN:

12 Q. Doctor, have all the opinions that you've  
13 offered here today regarding the treatment you  
14 performed on Tina Lindquist been offered with  
15 any reasonable degree of medical certainty?

16 A. Yes, sir.

17 Q. And is it your opinion within a reasonable  
18 degree of medical certainty that all of the  
19 injuries that you treated Tina Lindquist for,  
20 that being the traumatic amputation of eight  
21 fingers on her hands were reasonably related to  
22 the accident took place on September 25, 2002?

23 A. Yes.

24 Q. And do you feel that these conditions are  
25 permanent?

1 A. Yes.

2 Q. That's all I have, doctor. May have some  
3 cross-examination for you.

4 A. Can we go on hold for a second? I need to use  
5 the rest room.

6 THE VIDEOGRAPHER: Sure. We're now  
7 going off the record. It is approximately 2:58  
8 p.m.

9 - - - -

10 (There was a brief pause in the proceedings.)

11 - - - -

12 MR. CONLIN: I'm going to mark these  
13 as exhibits 2 and 3 for Hood. No. 2 being  
14 photographs 142, 145, 149, 153 and 162. And  
15 Hood 3 being photographs 168, 170, 173, 175,  
16 176, 178 and 181. And this is four.

17 - - - -

18 (Exhibit Nos. 2 & 3 marked for identification.)

19 - - - -

20 (There was a brief pause in the proceedings.)

21 - - - -

22 THE VIDEOGRAPHER: We are now back on  
23 the record. It is approximately 3:00 p.m.

24 - - - -

25 - - - -